

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

GRADUAL TAYLOR ,	:	CASE No.1:02-cv-446
	:	
Plaintiff,	:	Weber, J
Vs	:	Black , M. J.
	:	
CHERYL HART,	:	
	:	
Defendant ,	:	

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MOTION OPPOSING PARTIAL SUMMARY JUDGMENT

Mr Taylor Pro Se. opposes the motion because a dispute of material facts exists.

Mrs Hart claims that Mr Taylor Said to her "Get In" and she also said that Mr Taylor said "I think that you are a cop " She used these made up statements as the reason that she signed a complaint causing Mr. Taylor to be arrested. For loitering for the purpose of Prostitution.

Mr Taylor Claims That though Mrs Hart did come up to his car twice suggesting that she was offering sexual favors , He told her he was just driving around .

Mr Taylor states that he parked his car and worked on his GPS Unit and was again approached by Mrs Hart who traveled the better part of a football field to try to get him to say or do something Illegal . When he didn't she stormed off mad and used the made up testimony to have him arrested .

Furthermore Mrs Hart now is trying to say that she had nothing to do with having Mr Taylor arrested though her signature is on the complaint.

Mrs Hart also fails to mention that she went up the hill a second time to try again to get Mr Taylor to fall into her trap.

There were by all accounts a tape of exactly what was said made by Mrs. Harts Team that they do as a matter of routine to prove exactly what was said between the undercover agent and The people that they are trying to arrest . We asked for that tape when I was trying to defend myself against this charge through discovery and they never produced it . If they had produced it , there would be no dispute as to what was said which opens the door for obstructing justice.

Another reason for my opposing Summery Judgment is that I am going for Punitive Damages and if I believe Summery Judgment would make it harder to win that .

I also am trying to get an attorney to look after my interests in this matter and I believe that it will make it less appealing to a prospective attorney.

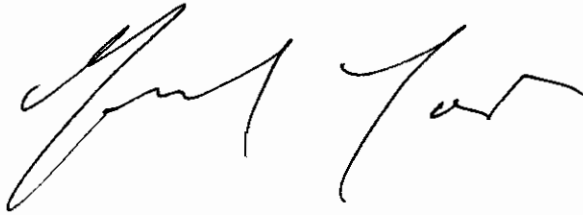
When a Police Woman charges a man with a sex crime it can be life changing . It was for me. I am Guessing that it would be for you too.

I want a trial where the facts come out . I am asking for punitive damages so that the next Time an officer wants to give a man a sex charge on his record ,they will not just arrest him and try to come up with the reasons later. They will Think Twice.

Respectfully submitted Gradual Taylor Pro Se

A handwritten signature in black ink, appearing to read 'Gradual Taylor', is written over a light gray rectangular background.

This motion is being sent by regular mail to Richard Ganulin City Solicitors office for the City of Cincinnati, 801 Plum Street Suite 214 City Hall Cincinnati, Ohio 45202

A handwritten signature in black ink, appearing to read "Ganulin" followed by a stylized flourish.